

MEMO ENDORSED

The Law Offices of



ONAODOWAN & DELINCE

December 17, 2021

VIA ECF

The Honorable Andrew L. Carter
 Thurgood Marshall
 United States Courthouse
 40 Foley Square
 New York, NY 10007

Esere J. Onaodowan, Esq.

eonaodowan@eocdlaw.com t 646.375.2119 c 718.427.3139

Christine E. Delince, Esq.

cdelince@eocdlaw.com t 646.375.2117 c 917.238.9332

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DATE FILED: 12-20-21

RE: *United States v. Mario Feliciano* 21 Cr. 673 (ALC)
 Modification of Bail Conditions

Dear Judge Carter:

I represent Mr. Mario Feliciano in the above referenced matter. We write to respectfully request that the bail conditions set by Magistrate Judge Sarah Cave on November 4, 2021 be modified for Mr. Feliciano to be able to work. Mr. Feliciano has secured new employment with Uber as a driver.

The bail conditions set on November 4, 2021 for Mr. Feliciano include a curfew enforced by location monitoring. Currently, his curfew allows him to leave his home by 6am every morning and requires him to be back in his home by 8pm every evening. We are requesting that the curfew enforced by location monitoring be removed as a condition of Mr. Feliciano's bail.

As a result of this indictment, Mr. Feliciano was not able to return to his job and has not worked in approximately one month. He has two children and is expecting a third child shortly. In addition to financially providing for his children, Mr. Feliciano must pay his rent, car note, car insurance, and credit card bills. His new employment will allow him to work as often as he can so that he can maintain financial stability in the community. The curfew enforced by location monitoring impedes his ability to work as much as possible. I have spoken with pretrial services, and I understand that Mr. Feliciano has had no compliance issues since his release.

I have conferenced this matter with the Government and pretrial services and neither party has any objections to the proposed bail modification.

For those reasons, Your Honor's immediate attention is appreciated.

SO ORDERED:

 ANDREW L. CARTER, JR.
 U.S. DISTRICT JUDGE
 12-20-21

Respectfully submitted,

 Esere J. Onaodowan, Esq.

CC via email: AUSA Aline Flodr, AUSA Daniel Wolf
 AUSA Jonathan Rebold,
 Pretrial Officer Ashley Cosme